

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WHITEMAN TO
NATIONAL POSTAL POLICY COUNCIL INTERROGATORY NPPC/USPS-T4-4,
REDIRECTED FROM WITNESS MONTEITH
(May 26, 2021)**

The United States Postal Service hereby provides the response of witness Curtis Whiteman to the above-listed interrogatory. Each interrogatory is stated verbatim and followed by the relevant response.

The Postal Service believes that the proponent has exceeded the limit on interrogatories set forth in Rule 3020.117(a), pursuant to federal case law adopted by the Commission. Order No. 2080, Order Adopting Amended Rules of Procedure for Nature of Service Proceedings under 39 U.S.C. 3661 (May 20, 2014), at 44. Nevertheless, the Postal Service has chosen to respond to these interrogatories in lieu of filing a motion to be excused from doing so on numerosity grounds. The Postal Service's choice to accommodate the proponent in this specific instance should not be construed as a waiver of the Postal Service's right to seek excusal from any further interrogatories by this or any other party on numerosity or other grounds.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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May 26, 2021

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NPPC/USPS-T4-4. Is the Postal Service forecasting volume increases (as compared to FY2020) in First-Class Mail in FY2021 and FY2022? If so, please provide those estimates and indicate whether they are adjusted for the effect of any rate changes (compared to current rates) that would apply in those periods.

RESPONSE:

No.